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Attorneys for Plaintiff Stanmore C. Cooper

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

STANMORE C. COOPER,

Plaintiff,

v.

FEDERAL AVIATION
ADMINISTRATION; SOCIAL SECURITY
ADMINISTRATION; UNITED STATES
DEPARTMENT OF TRANSPORTATION,

Defendant.

No. C 07-1383 VRW

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINES**

STIPULATION

1. On December 5, 2007, the parties stipulated to extend the deadlines for fact and expert discovery, and dispositive motions because they were in the process of arranging for a private mediation to attempt to resolve the case.

2. On December 12, 2007, the Court ordered new deadlines as follows:

Fact Discovery Cut-Off: January 31, 2008

Dispositive Motions Cut-Off: February 7, 2008

Dispositive Motions Hearing: March 20, 2008

Expert Disclosure: March 17, 2008

Expert Discovery Cut-Off: April 28, 2008

Pretrial Conference: May 8, 2008

3. Almost all fact discovery has been completed. However, the parties have identified several remaining discovery issues. Also, defendants have agreed to re-open a deposition. That deposition is currently scheduled for January 31, 2008. Given the outstanding discovery issues and the upcoming deposition, the parties seek a brief extension of time to seek resolution of their remaining discovery disputes and to obtain the transcript of the upcoming deposition prior to filing any dispositive motions. For these reasons, the parties stipulate to extend the dispositive motions and expert discovery deadlines as follows:

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Dispositive Motions Cut-Off: March 13, 2008

Dispositive Motions Hearing: April 17, 2008

Expert Disclosure: April 16, 2008

Expert Discovery Cut-Off: May 28, 2008

Pretrial Conference: June 12, 2008

No trial date has been set.

IT IS SO STIPULATED.

DATED: January 23, 2008

Respectfully submitted,

JOSEPH P. RUSSONIELLO
United States Attorney

/s/
JENNIFER S WANG
Assistant United States Attorney

DATED: January 23, 2008

REED SMITH, LLP

/s/
JAMES M. WOOD
Attorneys for Plaintiff Stanmore C. Cooper

~~PROPOSED~~ ORDER

Pursuant to the parties' stipulation and good cause having been shown, it is ordered that:

1. The last date for dispositive motions hearing is extended to April 17, 2008
2. The deadline for expert disclosures is extended to April 16, 2008
3. The expert discovery cut-off date is extended to May 28, 2008
4. The Pretrial Conference is set for June 12, 2008. at 3:30 p.m.

IT IS SO ORDERED.

DATED: 1/25/2008

